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U.S. DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

PAUL SALADINO, MD.

Plaintiff,

vs.

FRANK TUFANO

FRANKIE'S FREE RANGE MEAT LLC

Defendants

Case No.: 6:20-CV-09346

RESPONSE TO SUPPORT OF
 APPLICATION TO VACATE INQUEST
 AND REQUEST FOR POSTPONEMENT
 OF CASE DUE TO MEDICAL
 EMERGENCY

1. David D. Lin's Esq. has failed to provide legitimate sources from entities tied to this lawsuit and continues to use documentation about outside entities, which were obtained by fraudulent subpoenas, to create the illusion that Frank Tufano has "profited millions," when the reality is the opposite.
2. David D.. Lin has cherry-picked videos from Frank Tufano's YouTube channel to create a false narrative, mainly by omitting Frank Tufano's hardships of having his New York Business shut down by the USDA and being financially crippled by dozens of lawsuits.
3. David D. Lin Esq. has provided no proof of significant income or assets from

- 1 4. Frank Tufano's recent medical issues have left him financially crippled, being
2 partially blinded from a surgery that occurred in November of 2023, has left him
3 awaiting disability approval and unable to work or perform his normal duties.
4 Since this surgical error Frank Tufano has undergone 10 procedures in attempts
5 to correct and restore his vision and has an upcoming procedure that will be
6 addressed further in the complaint.
7
- 8 5. These medical issues have greatly impacted Frank Tufano's ability to manage his
9 legal issue. Frank Tufano has not had any income to pay for his legal
10 representation to file all possible motions and court actions and is not physically
11 or mentally well enough to research adequate law to represent himself in a fair
12 manner.
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- 14 6. David D. Lin Esq. continues to refer to "Frankie's Free Range Meat LLC," as
15 "FFRM" which is factually incorrect as that may cause confusion with other
16 entities or business abbreviations.
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- 18 7. The entity that David D. Lin Esq. is going after for monetary damages
19 "Frankie's Free Range Meat," went out of business in the year 2021. The
20 monetary strain caused by this lawsuit, and another separate lawsuit with the
21 other business partner, resulted in "Frankie's Free Range Meat LLC," to be
22 unable to afford paying their lease, which they were then evicted from their
23 business location in Bronx Housing Court, ceasing business operations. The
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1 8. Therefore, any income documentation past the middle of 2021 would not apply
2 to this lawsuit as Frank Tufano's business operations under "Frankie's Free
3 Range Meat LLC," ceased to exist – not that David D. Lin Esq. has provided
4 any documentation that was operating under this LLC name.
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6 9. David D. Lin claims there is evidence of "millions of dollars of income," but the
7 documents he provided do not state the entities named in this lawsuit, nor has
8 this documentation been obtained with legitimate subpoenas as the
9 organizations providing information did not notice the entity discretion.
10

11 10. It is very clear that David D. Lin Esq. was unable to find any proof of income or
12 significant assets for the entities named in this lawsuit, so is therefore attempting
13 to use deceptive and fraudulent practices to form a narrative.

14 11. Paul Saladino has clearly not suffered any monetary damages, as his social media
15 presence and business presence is 100s of times that of Frank Tufano. Paul
16 Saladnio has amassed dozens of millions of views and followers across all social
17 media channels while Frank Tufano maintains less than 100,000. Paul Saladino's
18 following has grown and continues to grow through the entirety of this lawsuit,
19 clearly showing that whatever Frank Tufano has done has had no measurable
20 negative impact on his reputation on any social media platform.
21

22 12. Any claim that Paul Saladino's reputation suffering from Frank Tufano's actions
23 is completely negated by his gigantic social media following relative to Frank
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1 personal issue after Frank Tufano recognized Paul Saladino's parasitic behavior
2 and had to defend his own personal social media pages and business.

3 13. Paul Saladino has profited substantially to the point that he has been able to
4 spend nearly a hundred thousand dollars in legal counsel to go after Frank
5 Tufano, who has been financially crippled to the point of not being able to pay
6 his own attorneys fees, evident by his inadequate representation throughout this
7 case.
8

9 14. Frank Tufano is only representing himself in this lawsuit, the entity "Frankie's
10 Free Range Meat LLC," may go unrepresented, however Frank Tufano urges the
11 court not to grant any sort of judgement against the LLC as it is likely David D.
12 Lin, Esq. will use the judgement to attempt to obtain assets from other entities
13 not relevant to this lawsuit, as he has done so with the subpoenas that were
14 issued by the judge. There is no reason to issue a judgement against a closed
15 business that has shut down it's operation and has no viable assets.
16

17 15. The information from the subpoenas was fraudulently obtained because the
18 documents that David Lin Esq. has presented are from entities not named in this
19 lawsuit. The Shopify Store operates under an entirely different LLC, not named
20 in this lawsuit, yet David D. Lin Esq. is attempting to link the sales from this
21 entity to Frank Tufano and "Frankie's Free Range Meat LLC."
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23 16. Frank Tufano has not earned any personal income from his businesses. His
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1 business partner. Because he no longer has any personal income, including
2 business profits, Frank Tufano has not filed any taxes in the recent two years.

3 17. David D. Lin Esq. has provided income in the millions of dollars from Papal
4 and Shopify, but this income is not tied to the entities named in this lawsuit,
5 Frank Tufano, or “Frankie’s Free Range Meat LLC.” If this income was directly
6 tied to Frank Tufano is any sort of profitable amount it would have been
7 reflected in his personal tax returns or the tax returns for a specific business
8 entity, which is not true.
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10 18. Frank Tufano providing his personal tax documentation is a gesture showing
11 that his attempted business operations have not been as successful as Paul
12 Saladino and David D. Lin Esq. are lead to believe. Frank Tufano has made no
13 personal profit from any of his business operations from the year 2019-2025,
14 clearly due to the dozens of lawsuits, shut down of Frankie’s Free Range Meat
15 LLC business operations, and more recent medical issues.
16

17 19. David D. Lin Esq. has attempted to link the websites “frank-tufano.com,” and
18 “frankiesfreerangemeat.com,” to the entities in this lawsuit “Frank Tufano,” and
19 “Frankie’s Free Range Meat LLC,” as well as the income shown from his
20 subpoenas, but has no proof of this link. He has not proven a link of these
21 websites to the entities in this case or the income provided by the subpoenas.
22

23 20. David D. Lin Esq. then attempts to link this income to the entities in this
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1 file a new lawsuit against the correct business entities, such as “LYT Broth
2 LLC,” and Frank Tufano’s former business partner “Adam Starowicz.”

3 21. The lawsuits brought up by Frank Tufano were to demonstrate the cease of
4 operation of the named entity in this lawsuit “Frankie’s Free Range Meat LLC.”
5 The financial strain from the arbitration resulted ultimately in the termination of
6 their lease and close of the business operating location for “Frankie’s Free Range
7 Meat LLC.” There was a judgement issued for the United Parcel Service against
8 this LLC, however they were unable to collect as the business closed down and
9 therefore has no physical or online assets.
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11 22. David D. Lin Esq. continues to claim that Frank Tufano has received profits
12 personally but has no proof of these received profits. Frank Tufano.
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14 23. Because of Frank Tufano’s failed business ventures, mainly due to financial
15 strain from a tarnished business relationship and ongoing lawsuits, and recent
16 medical issues resulting in extreme debt from multiple surgeries and procedures,
17 Frank Tufano is unable to pay any attorney’s fees or monetary damages
18 requested. Frank Tufano has complied with all other requests with the court.
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20 24. Regardless of this, the previous operation of “Frankie’s Free Range Meat LLC,”
21 and income is largely irrelevant to the initial case filing, which is a personal
22 trademark dispute between Paul Saladino and Frank Tufano. The LLC was
23 amended into the lawsuit for no legitimate reason and Frank Tufano’s legal
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1 go beyond what is necessary to remedy any wrongdoing that could have possibly
2 occurred.

3 26. Even more relevantly, Paul Saladno's secret society connections to social media
4 have made any sort of backlash claims untruthful. The social media platforms
5 control what the public sees, and it is very clear that Frank Tufano's social media
6 pages have been suppressed while Paul Saladino's have been promoted. It is
7 beyond comical for someone with tens of millions of followers to claim that an
8 individual with less than 100,000 has any significant negative impact on their
9 business.
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11 27. Because of his legal troubles, Frank Tufano had lost his domicile in New York,
12 his business in New York, his family and relatives have abandoned him, and the
13 courts allowance of this legal harassment has caused, and continues to cause
14 permanent damage to Frank Tufano's well being. It is not unreasonable to
15 consider this Tortious Interference, as the actions of Paul Saladino and David D.
16 Lin Esq. have caused Frank Tufano to be in an unrecoverable state, let alone one
17 where he would be able to pay a ludicrous sum of money that has no legitimate
18 basis.
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20 28. It is very clear that Frank Tufano has not been represented fairly by his attorney,
21 and it is also very clear that the court has approved of improper service of
22 various documents in favor of the Plaintiff.
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1 30. As mentioned, Frank Tufano has been suffering from significant medical issues,
2 and therefore will be undergoing another major surgery in early May. Frank
3 Tufano will be significantly visually impaired for a minimum of 3 months.
4 Because of this medical emergency Frank Tufano is requesting that any further
5 hearings or actions be held until August 20, 2025, which is 3 months of
6 estimated recovery from the upcoming surgical date.
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8 Dated: April 21, 2025

9 By: /s/ Frank Tufano

10 Frank Tufano
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